

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

FINANCIALRIGHT CLAIMS GMBH, )  
                                    )  
Plaintiff,                     )  
                                   ) C.A. No. 24-929-CFC  
v.                              )  
                                   )  
BURFORD GERMAN FUNDING )  
LLC,                            )  
                                   )  
Defendant.                    )

**DEFENDANT'S MOTION TO COMPEL ARBITRATION AND  
TO STAY FURTHER PROCEEDINGS PENDING ARBITRATION**

Defendant Burford German Funding LLC hereby moves this Honorable Court for an Order in the form submitted herewith, compelling arbitration of Plaintiff financialright claims GmbH's claims, and staying the above-captioned action pending arbitration.

The bases for this motion are set forth in the accompanying Opening Brief in support of this motion.

Dated: December 20, 2024

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LLC,                            )  
                                    )  
Defendant.                    )

**[PROPOSED] ORDER**

IT IS HEREBY ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2025, that

Defendant Burford German Funding LLC's Motion to Compel Arbitration and to Stay Further Proceedings Pending Arbitration is GRANTED.

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Honorable Colm F. Connolly  
Chief, United States District Court Judge

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BURFORD GERMAN FUNDING     )  
LLC,                            )  
                                    )  
Defendant.                    )

**LOCAL RULE 7.1.1 CERTIFICATION**

Counsel for Defendant Burford German Funding LLC certifies that a reasonable effort was made to reach agreement with Plaintiff financialright claims GmbH regarding the matters set forth in Burford's Motion to Compel Arbitration, including oral communication involving Delaware counsel for all parties, but no agreement was reached.

Dated: December 20, 2024

YOUNG CONAWAY STARGATT  
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**CERTIFICATE OF SERVICE**

I hereby certify that, on December 20, 2024, I caused copies of the foregoing documents to be served upon the counsel listed below in the manner indicated:

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